

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

SUPERSEDING INDICTMENT

v.

AUSTIN KOECKERITZ,

Case No. 23-cr-5-jdp

18 U.S.C. § 1589(a)

18 U.S.C. § 1594(a) & (d)

18 U.S.C. § 1591(a)(1), (b)(1), (b)(2), & (c)

18 U.S.C. § 2423(a) & (b)

18 U.S.C. § 2251(a)

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 2253

18 U.S.C. § 981(a)(1)

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

From in or about August 2020, to on or about August 5, 2022, in the Western District of Wisconsin, the defendant,

AUSTIN KOECKERITZ,

attempted to, and knowingly provided and obtained the labor and services of "Jane Doe 1," by means of force, threats of force; by means of serious harm and threats of serious harm to "Jane Doe 1" and threats of serious harm to another person; and by means of any scheme, plan, and pattern intended to cause "Jane Doe 1" to believe that, if "Jane Doe 1" did not perform such labor and services, that "Jane Doe 1" and another person would suffer serious harm; and by any combination of such means.

(In violation of Title 18, United States Code, Sections 1589(a) and 1594(a)).

COUNT 2

From in or about August 2020, to on or about August 5, 2022, in the Western District of Wisconsin, the defendant,

AUSTIN KOECKERITZ,

attempted to, and knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means "Jane Doe 1," in and affecting interstate commerce, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause "Jane Doe 1" to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) & (b)(1), and 1594(a)).

COUNT 3

From in or about October 2021, to in or about January 2022, in the Western District of Wisconsin, the defendant, exact date unknown,

AUSTIN KOECKERITZ,

attempted to, and knowingly recruited, enticed, harbored, transported, obtained, and maintained, by any means, "Jane Doe 2," in and affecting interstate commerce, having had a reasonable opportunity to observe "Jane Doe 2," and knowing, and in reckless disregard of the fact, that "Jane Doe 2" had not attained the age of 18 years and would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), & (c), and 1594(a)).

COUNT 4

On or about October 21, 2021, in the Western District of Wisconsin and elsewhere, the defendant,

AUSTIN KOECKERITZ,

knowingly traveled in interstate commerce with a motivating purpose of engaging in any illicit sexual conduct with another person, specifically, "Jane Doe 2."

(In violation of Title 18, United States Code, Section 2423(b)).

COUNT 5

Between in or about October 2021, and in or about January 2022, the exact date unknown, in the Western District of Wisconsin and elsewhere, the defendant,

AUSTIN KOECKERITZ,

knowingly transported "Jane Doe 2," who had not attained the age of 18, in interstate commerce from Minnesota to Wisconsin, with intent that "Jane Doe 2" engage in any sexual activity for which a person can be charged with a criminal offense, namely second degree sexual assault of a child, in violation of Wisconsin Statute 948.02(2).

(In violation of Title 18, United States Code, Section 2423(a)).

COUNT 6

Between in or about October 2021, and in or about January 2022, exact date unknown, in the Western District of Wisconsin, the defendant,

AUSTIN KOECKERITZ,

did employ, use, persuade, induce, entice, and coerce a minor, "Jane Doe 2," to engage in sexually explicit conduct for the purpose of producing any visual depictions of such

conduct, knowing and having reason to know that such visual depictions would be transported using any means and facility of interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNTS 7 - 9

On or about the dates listed below, in the Western District of Wisconsin, and elsewhere, the defendant,

AUSTIN KOECKERITZ,

knowingly conducted and attempted to conduct the following financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, specifically, forced labor and sex trafficking as alleged in Counts 1 and 2 of this indictment, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, source, ownership and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct the financial transactions listed below, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

COUNT	DATE	NATURE OF TRANSACTION
7	5-12-2021	Deposit of check made payable to Jane Doe 1 in the amount of \$2,155.12 into account #xx785 at St. Paul Federal Credit Union.
8	10-27-2021	Deposit of check made payable to Jane Doe 1 in the amount of \$2,155.11 into account # xx785 at St. Paul Federal Credit Union.
9	8-3-2022	Deposit of check made payable to Jane Doe 1 in the amount of \$2,192.26 into account # xx785 at St. Paul Federal Credit Union.

(All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)).

#### FORFEITURE ALLEGATIONS

1. As a result of the offenses charged in Counts 1 and 2 of this indictment, and upon conviction for violating Title 18, United States Code, Sections 1589(a) and 1594(a), pursuant to Title 18, United States Code, Section 1594(d), the defendant, AUSTIN KOECKERITZ, shall forfeit to the United States his right, title, and interest in:

a. any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and

b. any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of such violation, or any property traceable to such property, including but not limited to:

- i. \$4,905.96 seized from an account at St. Paul Federal Bank;
- ii. \$1,619.99 seized from an account at Bremer Bank;
- iii. \$1,238.21 seized from an account at Bremer Bank;

- iv. \$48,162.82, seized from an account at Bremer Bank;
- v. Funds from an account at Robinhood with a balance of \$14,441.51 as of January 10, 2023;
- vi. Funds from an investment account at Robinhood with a balance of \$32,775.92 as of December 31, 2022;
- vii. Funds from an investment account at SoFi with a balance of \$11,958.58 as of January 5, 2023;
- viii. Funds from an investment account at SoFi with a balance of \$20,218.72 as of January 5, 2023;
- ix. Funds from an investment account at SoFi with a balance of \$1,121.29 as of January 5, 2023; and
- x. Real property located at 45 206<sup>th</sup> St. in New Richmond, Wisconsin, with all appurtenances and improvements thereon.

2. As a result of the offense charged in Count 6 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2251(a), pursuant to Title 18, United States Code, Section 2253, the defendant, AUSTIN KOECKERITZ, shall forfeit to the United States his right, title, and interest in:

- a. Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained, and
- b. any and all property used or intended to be used to commit or to promote the commission of the aforementioned offense.

3. As a result of the offenses charged in Counts 7 - 9 of this indictment, and upon conviction for violating Title 18, United States Code, Section 1956(a)(1)(B)(i), pursuant to Title 18, United States Code, Section 981(a)(1), the defendant, AUSTIN KOECKERITZ, shall forfeit to the United States his right, title, and interest in property, real or personal, involved in such offense, and any property traceable to such property, including a sum of money equal to \$6,502.49 in United States currency, representing the amount of money involved in the money laundering offense.

A TRUE BILL

  
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PRESIDING JUROR

Indictment returned: 3/16/2023

  
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for TIMOTHY M. O'SHEA  
United States Attorney